

EXHIBIT 5

Schedule of Deposition Witnesses and Missing Documents
(Prejudice to Discovery Effectiveness and Efficiency)¹

Witness	Role	Date	Key Unavailable or Withheld Documents (Never Produced or Located) "NP"
James Barnes	Former CCBOER Election Supervisor	7/2/22	<ul style="list-style-type: none"> -Security Video breaches -Barnes's emails to SOS re: election security (Doc.30-1) -Barnes's photographs of equipment security issues found on GBI image -Barnes's email re: seizing of EMS server (Doc.30-3) -Barnes's emails re: system password problems --ICC scanner and EMS server records from seized equipment (not preserved by CCBOER) [NP] -SSA copies of Coffee system (produced by SSA in August 2022 --Roberts' emails re: equipment recertification (Doc. 31-8) -All CCBOER member breach-related communications (emails and text messages) [NP] -complete privilege log³ [NP]
Cathy Latham	<ul style="list-style-type: none"> -1/7/21 breach participant -Former Coffee County GOP Chair 	8/8/22	<ul style="list-style-type: none"> -Video security recordings breaches - Haliburton email initiating breaches (Doc.60-1) - Chaney communications with Latham [NP] --ICC scanner and EMS server records from seized equipment (not preserved) --SSA copies of Coffee system² --SSA photographs of breach²
Eric Chaney	<ul style="list-style-type: none"> -1/7/21 Breach participant -Former CCBOER member 	8/15/22	<ul style="list-style-type: none"> - Security Video breaches -Haliburton email initiating breaches -All Chaney election-related communications -Barnes's emails to SOS re: election security -Barnes's photographs of equipment security issues -Barnes's email re: seizing of EMS server -Barnes's emails re: system password problems --ICC scanner and EMS server records from seized equipment (not preserved by CCBOER) [NP]

			--Minutes of 2/25/21 Exec. Session [NP] -SSA produced copies of Coffee system -SSA photographs of breach -documents concerning search for Hampton's emails --Roberts' emails re: equipment recertification -- complete privilege log ³ [NP]
Jil Ridlehoover	-Eyewitness to 3 breaches -Former CCBOER Asst. Election Supervisor	8/16/22	-Security Video breaches - Barnes's emails to SOS re: election security -Barnes's photographs of equipment security issues -Barnes's email re: seizing of EMS server -Barnes's emails re: system password problems --ICC scanner and EMS server records from seized equipment (not preserved by CCBOER) [NP] --Minutes of 2/25/21 Exec. Session [NP] -SSA produced copies of Coffee system ² -SSA photographs of breach ²
Ben Cotton	-Forensic professional who obtained and analyzed Coffee stolen software	8/25/22	-Security video of breaches -ICC scanner and EMS server records from seized equipment (not preserved by CCBOER)
		8/27/22	-Exterior video produced
Wendell Stone	-Former Chair CCBOER and 30(b)(6) witness	9/1/22	- Security Video of breaches -Haliburton email initiating breaches -All Stone breach-related communications -All CCBOER member breach-related communications (emails and text messages) [NP] -Barnes's emails to SOS re: election security -Barnes's photographs of equipment security issues -Barnes's email re: seizing of EMS server -Barnes's emails re: system password problems --ICC scanner and EMS server records from seized equipment (not preserved by CCBOER) --Minutes of 2/25/21 Exec. Session [NP] -documents concerning search for Hampton's emails

			<ul style="list-style-type: none"> -information concerning contact with GBI [NP] -Roberts' emails re: equipment recertification - complete privilege log³ [NP] -CCBOER silver/gray laptop used by Hampton [NP]
SullivanStrickler “SSA”	<ul style="list-style-type: none"> -Forensic firm hired by Sidney Powell to which copy/distribute voting system software and data 	9/2/22	<ul style="list-style-type: none"> --Security Video of breaches -Haliburton email initiating breaches -ICC scanner and EMS server records from seized equipment (not preserved by CCBOER) --Barnes's emails re: system password problems ---All CCBOER member breach-related communications (emails and text messages) -- complete privilege log³ [NP]
		9/16/22	Interior video produced
Robert Sinners	<ul style="list-style-type: none"> -Former Trump campaign official, currently with SOS office. - Communications with individuals involved in breach 	9/28/22	<ul style="list-style-type: none"> -Haliburton email initiating breaches -All CCBOER member breach-related communications (emails and text messages) [NP] -Barnes's emails to SOS re: election security -Barnes's photographs of equipment security issues -Barnes's email re: seizing of EMS server -Barnes's emails re: system password problems --Minutes of 2/25/21 Exec. Session [NP]
Misty Hampton	<ul style="list-style-type: none"> -Former CCBOER Election Supervisor -permitted and participated in 3 Coffee breaches 	11/11/22	<ul style="list-style-type: none"> --Haliburton email initiating breaches --Hampton “invitation” to Haliburton -Barnes's emails to SOS re: election security -Barnes's photographs of equipment security issues -Barnes's emails re: system password problems --Minutes of 2/25/21 Exec. Session [NP] -All CCBOER member breach-related communications (emails and text messages) -complete privilege log³ [NP] -CCBOER silver/gray laptop used by Hampton [NP]
Doug Logan	<ul style="list-style-type: none"> -CEO Cyber Ninjas -obtained and distributed Coffee software 	11/18/22	<ul style="list-style-type: none"> -Haliburton email initiating breaches -All CCBOER member breach-related communications (emails and text messages) -Barnes's emails to SOS re: election security

	<p>and data -visited Coffee 2 days accessing system</p>		<p>-Barnes's photographs of equipment security issues -Barnes's email re: seizing of EMS server -Barnes's emails re: system password problems --ICC scanner and EMS server records from seized equipment (not preserved by CCBOER) --Minutes of 2/25/21 Exec. Session [NP] - complete privilege log³ [NP]</p>
Ed Voyles	<p>-Former CCBOER member -participant in 1/7/21 breach</p>	11/16/22	<p>-Haliburton email initiating breaches -All CCBOER member breach-related communications (emails and text messages) [NP] -Barnes's emails to SOS re: election security -Barnes's photographs of equipment security issues --Minutes of 2/25/21 Exec. Session [NP] - complete privilege log³ [NP]</p>
Jeffrey Lenberg	<p>-Computer scientist -participated in 2nd and 3rd breaches -tampered with system computers -obtained all SSA imaged software and data</p>	11/21/22	<p>-Haliburton email initiating breaches -All CCBOER member breach-related communications (emails and text messages) -Barnes's emails to SOS re: election security -Barnes's photographs of equipment security issues -Barnes's email re: seizing of EMS server -Barnes's emails re: system password problems --Minutes of 2/25/21 Exec. Session [NP] - complete privilege log³ [NP]</p>
Alex Cruce	<p>-Analyst working with Cheeley -participant in 1/7/21 breach</p>	11/22/22	<p>-Haliburton email initiating breaches -All CCBOER member breach-related communications (emails and text messages) -Barnes's emails to SOS re: election security -Barnes's photographs of equipment security issues -Barnes's email re: seizing of EMS server -Barnes's emails re: system password problems - complete privilege log³ [NP]</p>

1. This table demonstrates that highly relevant documents withheld from Plaintiff, and of which they had no knowledge, materially impaired the necessary information available to them at the time of the depositions. As

can be seen, the order of witnesses would have changed had plaintiffs known of the seminal document from Preston Haliburton (Doc.60-1) initiating the breaches, or the existence of the security video recordings, which would have identified breach participants. (Also see Doc. 60 at 9.)

2. SSA document and deposition subpoena would likely have been served at the beginning of discovery had plaintiffs been aware of the withheld Haliburton email and video recording of the SSA activities. Such records would then have informed the remainder of the discovery plan and activities.
3. A compliant privilege log has still not been produced. (See 60 at 10-12) the 2,670 document privilege log served on January 4, 2024 ended with communications dated July 25, 2022 despite the fact that CCBOER depositions were scheduled into September and documents were purportedly being collected.